

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION:
NO. 04-10751-FDS

STACEY STANTON)
Plaintiff)
v.)
METRO CORP.,)
Defendant)

PLAINTIFF'S RULE 26(a) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a), Plaintiff, STACEY STANTON, hereby serves these Initial Disclosures to Defendant. Appendix A to these disclosures identifies those individuals who may have discoverable information relevant to disputed facts alleged with particularity in the pleadings. Appendix B to these disclosures describes the documents, data compilations and tangible things in the possession, custody or control of Plaintiff that may be relevant to disputed facts alleged with particularity in the pleadings. Appendix C to these disclosures provides a computation of damages claimed by Plaintiff.

These disclosures do not include the names of any potential experts retained or consulted by the Plaintiff. The Plaintiff will produce information relating to experts as may be appropriate under Federal Rule of Civil Procedure 26(a)(2) at the times provided by that Rule or order of the Court.

These disclosures do not constitute waiver of any work product protection.

Respectfully Submitted,
The Plaintiff, Stacey Stanton
By Her Attorney:

/s/ John P. Donohue
John P. Donohue, Esquire
Fuller, Rosenberg, Palmer & Beliveau, LLP.
340 Main Street, Suite 817
Worcester, MA 01608
Tel. No. (508) 751-5128
BBO # 567008

Dated: May 23, 2006

APPENDIX A

A. Individuals who may have discoverable information relevant to disputed facts alleged with particularity in the pleadings.

Listed below are the individuals who may have discoverable information relevant to disputed facts alleged with particularity in the pleadings:

1. Stacey Stanton, 516 Central Street, Manchester NH
Telephone No. (603) 668-3474;
2. Mr. Bruce Welch, 516 Central Street, Manchester, NH
Telephone No. (603) 668-3474;
3. Mary Ann Moran, 36 South Watch, Meredith, NH
Telephone No. (603) 279-8765;
4. Maurice Moran, 36 South Watch, Meredith, NH
Telephone No. (603) 279-8765;
5. Megan Pappas, 36 Foxwood Circle, Manchester, NH
6. Brianna Dusseault, 233 Ray Street, Manchester, NH

APPENDIX B

B. Description of documents that may be used to support plaintiff's claims:

1. Boston Magazine, May 2003 edition
2. Plaintiff's medical records of Spiros Mitsopoulos, M.D.,
Bay Medical Associates, 4 Elliott Way, Suite 102,
Manchester, NH 03130

APPENDIX C

- C. The following is a computation of Plaintiff's damages for emotional pain and suffering; mental pain and suffering; personal humiliation and damage to reputation and sense of personal dignity.**

Estimated Damages - \$500,000

This computation is provided in compliance with Rule 26(a)(1)(C) and represents a good faith estimate of the damages suffered by Plaintiff.

CERTIFICATION OF SERVICE

I, John P. Donohue, Esquire, do hereby certify that this document filed through the ECF system will be sent electronically to the registered participants identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 23, 2006.

/s/ John P. Donohue

John P. Donohue, Esquire